

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

<p>In re:</p> <p>INSTANT BRANDS ACQUISITION HOLDINGS INC., et al.,</p> <p style="text-align: center;">Debtors.¹</p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Chapter 11</p> <p>Case No. 23-90716 (MI)</p> <p>Jointly Administered</p> <p>Re: Docket Nos. 845, 878, 898, 926-1, and 983</p>
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**NOTICE OF FILING PLAN SUPPLEMENT TO THE DEBTORS’
COMBINED DISCLOSURE STATEMENT AND JOINT CHAPTER 11 PLAN**

PLEASE TAKE NOTICE that, on June 12, 2023, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the “**Court**”). The Debtors’ chapter 11 cases are being jointly administered under case number 23-90716 (MI) (the “**Chapter 11 Cases**”).

PLEASE TAKE FURTHER NOTICE that, on January 11, 2024, the Court entered the *Order (I) Approving the Disclosure Statement on a Conditional Basis, (II) Approving the Solicitation and Tabulation Procedures, (III) Approving the Forms of Ballots, Solicitation Package, and Notices, (IV) Establishing Certain Dates and Deadlines in Connection with the Solicitation and Confirmation of the Plan, (V) Scheduling a Combined Hearing For Final Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief* [Docket No. 924] (the “**Solicitation Order**”), pursuant to which the Debtors solicited votes with respect to the *Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization of Instant Brands Acquisition Holdings Inc. and its Debtor Affiliates* [Docket No. 926-1] (as amended, modified, or supplemented from time to time in accordance with the terms thereof (including all appendices, exhibits, schedules, and supplements (including any Plan Supplements) thereto), the “**Combined DS and Plan**” or the “**Plan**,” as applicable).²

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers or registration numbers in the applicable jurisdictions, are as follows: Instant Brands (Texas) Inc. (2526); Instant Brands Acquisition Holdings Inc. (9089); Instant Brands Acquisition Intermediate Holdings Inc. (3303); Instant Brands Holdings Inc. (3318); URS-1 (Charleroi) LLC (7347); Instant Brands LLC (0566); URS-2 (Corning) LLC (8085); Corelle Brands (Latin America) LLC (8862); EKCO Group, LLC (7167); EKCO Housewares, Inc. (0216); EKCO Manufacturing of Ohio, Inc. (7300); Corelle Brands (Canada) Inc. (5817); Instant Brands (Canada) Holding Inc. (4481); Instant Brands Inc. (8272); and Corelle Brands (GHC) LLC (9722). The address of the debtors’ corporate headquarters is 3025 Highland Parkway, Suite 700, Downers Grove, IL 60515.

² Capitalized terms used but not otherwise defined herein (including, for the avoidance of doubt, the exhibits hereto) shall have the meanings ascribed to them in the Combined DS and Plan.

PLEASE TAKE FURTHER NOTICE that, on February 1, 2024, the Debtors filed [Docket No. 983] the following exhibits to the Plan Supplement:

Exhibit A	Schedule of Retained Causes of Action
Exhibit B	Schedule of Rejected Contracts
Exhibit C	Summary of Material Exit Financing Documents
Exhibit D	Identity of the Reorganized Parent's Managers

PLEASE TAKE FURTHER NOTICE that attached hereto are the substantially final forms of the Plan Documents set forth below, which form part of the Plan Supplement:

Exhibit E	Litigation Trust Agreement
Exhibit F	Agreement Providing for the Litigation Trust Financing Facility
Exhibit G	Certain New Governance Documents

PLEASE TAKE FURTHER NOTICE that certain Plan Documents or portions thereof, including those (to be) contained in the Plan Supplement, remain subject to continuing negotiations among the Debtors and interested parties with respect thereto. Subject to the terms and conditions set forth in the Combined DS and Plan, the Debtors reserve all rights to amend, modify, or supplement the Plan Supplement and any of the Plan Documents and designations contained therein at any time prior to the Combined Hearing, or any such later date as may be permitted by the Combined DS and Plan or by order of the Court (including the Solicitation Order). To the extent amendments or modifications that the Debtors believe to be material are made to any Plan Document attached hereto, the Debtors will file a redline with the Court showing such changes.

PLEASE TAKE FURTHER NOTICE that the forms of the Plan Documents contained in the Plan Supplement are integral to—and, for the avoidance of doubt, are considered part of and incorporated by reference into—the Combined DS and Plan. For the avoidance of doubt, if the Plan is confirmed, the Plan Documents (including those in the Plan Supplement) will be approved by the Court pursuant to the Confirmation Order.

PLEASE TAKE FURTHER NOTICE that a Combined Hearing on the final approval of the Disclosure Statement and the Confirmation of the Plan will commence on **February 15, 2024 at 8:00 a.m. (prevailing Central Time)** in the Court before the Honorable Marvin Isgur, at 515 Rusk Street, Houston, Texas 77002. The Combined Hearing may be adjourned or continued from time to time by the Court or the Debtors by announcement of the adjournment or continuance at a hearing before the Court or by filing a notice on the Court's docket.

PLEASE TAKE FURTHER NOTICE that copies of the Combined DS and Plan, the Solicitation Motion, the Solicitation Order, and all other documents publicly filed in the Chapter 11 Cases (including the Plan Supplement), as well as additional information about the Chapter 11 Cases, can be accessed free of charge by visiting the Debtors' case information website located at <https://dm.epiq11.com/InstantBrands>.

Dated: February 8, 2024
Houston, Texas

HAYNES AND BOONE, LLP

/s/ David A. Trausch

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Counsel to the Debtors and Debtors in Possession

Certificate of Service

I certify that, on February 8, 2024, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ David A. Trausch

David A. Trausch